ITEM 11
SUPPORTING Doc No. 4

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SAN DIEGO REGION WATER QUALITY CONTROL BOARD

2005 MAY 23 P 1:17

May 20, 2005

California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court. Suite 100
San Diego California 92123-4340
Attention: Victor Vasquez

Subject: Tentative Order No. R9-2005-0136; NPDES Permit No. CA0107433, Waste Discharge Requirements for the City of Oceanside, San Luis Rey and La Salina Wastewater Treatment Plants and Brackish Groundwater Desalination Facility, Discharge to the Pacific Ocean Via the Oceanside Ocean Outfall

Dear Chairman Minan and Members of the Board:

We have reviewed the subject Tentative Order No. R9-2005-0136 and submit the following comments:

1. Item 4 of the submittal letter (POTW:01-0146.02:VASQV states that a reasonable potential analysis was conducted. The constituents that do not have a reasonable potential are listed as "performance goals". These constituents are to be monitored for informational purposes only, not compliance. However, the letter does not explain the cases in which these performance goals are exceeded and what steps should be taken. The Order should address these cases.
2. Endnotes, Page 37, Par. 12. Typographical error "he" should be "the".
3. Attachment E - Monitoring and Reporting Program. Section D. Benthic Monitoring. Item 2. Infauna on Page E-11 specifies the collection method. Will the Discharger be participating in regional benthic monitoring such as the Bight monitoring? If so then the sampling equipment and monitoring protocols should conform to the Bight requirements.
4. Attachment C- Flow Schematic is blank. Please provide the Flow Schematic.
5. Special Studies, Plume Tracking Study page E-13. Page E-10 shows that water temperatures are measured for each station at three depths, at the surface, mid-depth and bottom depth. Are these three temperature measurements at each station sufficient for the plume tracking studies? Will water salinity (density) be monitored? Our experience in analyzing the receiving waters monitoring data for the International Wastewater Treatment Plant showed the value of the CTD (conductivity, temperature, depth) data obtained by data loggers that provide these data at much closer depth intervals.
6. Page F-6. Last line. Provide the correct Table # .

7. Attachment G. Table I has the monthly effluent temperatures. Does the model require ocean water temperatures as a function of depth? Were the receiving waters temperature data at three depths used? Are these sufficient for the visual plumes dilution model to compute a dilution factor with an accuracy that is well below the dilution factor increase from the prior 82 to the revised 87, a change of 6.1%? What are the limits of the inputs to the VPlume model? We raise these questions because the on Board determined that antidegradation analysis is not required based on the modeling results (page F- 28).
8. Given these concerns, we strongly recommend that receiving water frequency be increased to yearly rather than at year 4 as noted in Tables 16 and Table 17 in order to evaluate the potential impacts compared with the historical sediment and benthic data.

Thank you for this opportunity to provide these comments.

Sincerely,

Ed Kimura
Water Issues
Sierra Club, San Diego Chapter